

**ORIGINAL**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

LAMONT VANDERHORST,  
a/k/a "Tiny Bum,"

Defendant.

**07 CRIM. 291**

SEALED INDICTMENT

07 of

USDC SDNY  
DOCUMENT

ELECTRONICALLY FILED

**APR 12 2007**

COUNT ONE

(Conspiracy to Commit Money Laundering)

The Grand Jury charges:

1. From in or about January 2007, through in or about February 2007, in the Southern District of New York and elsewhere, LAMONT VANDERHORST, a/k/a "Tiny Bum," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to violate Sections 1956(a)(3)(A), (B) and (C) of Title 18, United States Code.

2. It was a part and an object of the conspiracy that LAMONT VANDERHORST, a/k/a "Tiny Bum," the defendant, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, unlawfully, willfully, and knowingly conducted and attempted to conduct such financial transactions involving property represented by a law enforcement officer and by a person at the direction of, and with the approval of, a federal official authorized to investigate

**JUDGE KARAS**

violations of Title 18, United States Code, Section 1956, to be the proceeds of specified unlawful activity, to wit, narcotics trafficking, with the intent to (i) promote the carrying on of specified unlawful activity, (ii) conceal and disguise the nature, location, source, ownership and control of property believed to be the proceeds of specified unlawful activity, and (iii) avoid a transaction reporting requirement under State and Federal law, all in violation of Title 18, United States Code, Section 1956(a)(3).

OVERT ACTS

3. In furtherance of said conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about January 17, 2007, a confidential informant ("CI") sent approximately \$900 to a co-conspirator not named as a defendant herein ("CC-1") by interstate wire, having represented that these funds were the proceeds of narcotics trafficking.

b. On or about January 17, 2007, CC-1 picked up approximately \$900 that had been wired to him by the CI at a check cashing business in New York, New York.

c. On three separate occasions on or about February 23, 2007, the CI sent approximately \$999 to LAMONT

VANDERHORST, a/k/a "Tiny Bum," the defendant, by interstate wire, having represented that these funds were the proceeds of narcotics trafficking.

d. On or about February 26, 2007, the CI sent approximately \$999 to VANDERHORST by interstate wire, having represented that these funds were the proceeds of narcotics trafficking.

e. On or about February 27, 2007, the CI sent approximately \$999 to VANDERHORST by interstate wire, having represented that these funds were the proceeds of narcotics trafficking.

(Title 18, United States Code, Section 1956(h).)

COUNT TWO  
(Money Laundering)

The Grand Jury further charges:

4. On or about the dates specified in the chart below, in the Southern District of New York and elsewhere, LAMONT VANDERHORST, a/k/a "Tiny Bum," the defendant, in an offense involving and affecting interstate and foreign commerce, unlawfully, willfully, and knowingly conducted and attempted to conduct such financial transactions involving property represented by a law enforcement officer and by a person at the direction of, and with the approval of, a federal official authorized to investigate violations of Title 18, United States

Code, Section 1956, to be the proceeds of specified unlawful activity, to wit, narcotics trafficking, with the intent to (i) promote the carrying on of specified unlawful activity, (ii) conceal and disguise the nature, location, source, ownership and control of property believed to be the proceeds of specified unlawful activity, and (iii) avoid a transaction reporting requirement under State and Federal law, to wit, VANDERHORST caused United States currency, which a confidential informant represented to be the proceeds of illegal narcotics activities, to be wired to New York City in the following increments.

<u>DATE</u>	<u>AMOUNT TRANSFERRED</u>
1/17/07	\$900.00
2/23/07	\$999.00
2/23/07	\$999.00
2/23/07	\$999.00
2/26/07	\$999.00
2/27/07	\$999.00

(Title 18, United States Code,  
Section 1956(a)(3)(A), (B), and (C).)

**ASSET FORFEITURE ALLEGATION**

5. As a result of committing the offenses alleged in Counts One and Two of this Indictment, LAMONT VANDERHORST, a/k/a "Tiny Bum," the defendant, shall forfeit to the United States pursuant to Title 18, United States Code, Section 982, all property, real and personal, involved in the money laundering offenses and all property traceable to such property, including but not limited to the following:

a. At least \$5,895 in United States currency, representing the amount of property involved in the money laundering offenses and traceable to the money laundering offenses.

**Substitute Asset Provision**

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to, or deposited with, a third person;

(3) has been placed beyond the jurisdiction of the Court;

(4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982 and 1956.)

*Grace Lamacchia Paris*  
FOREPERSON

*Michael J. Garcia*  
MICHAEL J. GARCIA  
United States Attorney

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SOUTHERN DISTRICT OF NEW YORK

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Defendant.

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INDICTMENT

07 Cr.

(18 U.S.C. §§ 1956(a)(3) & 2)

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MICHAEL J. GARCIA  
United States Attorney.

A TRUE BILL

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*Paul Samachin - Basis*  
Foreperson.

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*Apr. 12, 2007 C.B.*

*Indictment filed. A/w issued.  
Ordered filed under seal.*

*Freeman USmj*